

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	STIPULATION AND (PROPOSED)
)	ORDER TO CONTINUE STATUS
)	CONFERENCE AND FOR
)	EXTENSION OF TIME UNDER
)	RULE 5.1 AND EXCLUSION OF
)	TIME UNDER THE SPEEDY
)	TRIAL ACT
SHAUN W. BRIDGES,)	
Defendant.)	

The Defendant, by and through his counsel, Steven H. Levin and Craig S. Denney, and the United States hereby stipulate to a continuance of the status hearing date in this case to May 27, 2015, at 9:30 a.m. before the duty Magistrate. The Defendant and the United States agree that good cause exists to extend the time limits of Rule 5.1 to May 27, 2015. The parties also agree that time is appropriately excluded under 18 U.S.C. § 3161, the Speedy Trial Act between May 5, 2015 and May 27, 2015.

The parties agree that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, to extend the time for the status hearing to May 27, 2015, to allow the parties time to investigate the matter further and to discuss a potential resolution of this matter. The parties also agree that an exclusion of time is appropriate under the Speedy Trial Act between May 5, 2015, and May 27, 2015, for purposes of continuity of counsel and effective preparation of counsel, in order to provide defense counsel with adequate time to review the matter conduct and investigation, and consult with the Defendant. In addition, the parties agree to exclude for this period of time any time limits applicable under 18 U.S.C. § 3161. The parties represent that

granting the continuance, in order to provide defense counsel adequate time to review the matter, conduct additional investigation, and consult with the Defendant, is necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such a continuance outweigh the best interests of the public and the Defendant in a speedy trial 18 U.S.C. §(3161(h)(7)(A).

SO STIPULATED:

Dated: April 29, 2015

/s/

Steven H. Levin, Esq.
Levin & Curlett LLC
201 N. Charles Street, Suite 2000
Baltimore, MD 21201
(410) 685-0078
(410) 685-2222 (fax)

/s/

Kathryn Haun
William Frentzen

Assistant US Attorneys

Pro Hac Vice for Mr. Bridges

/s/

Craig S. Denney
California Bar No. 244692
Snell & Wilmer,
50 West Liberty Street
Reno, Nevada 89501
Tel: (775)785-5440

Local Counsel for Mr. Bridges

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	(PROPOSED) ORDER TO
)	CONTINUE STATUS
)	CONFERENCE AND FOR
)	EXTENSION OF TIME
)	UNDER RULE 5.1 AND
)	EXCLUSION OF TIME UNDER
)	THE SPEEDY TRIAL ACT
)	
SHAUN W. BRIDGES,)	
Defendant.)	

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, for extending time under Rule 5.1 for a status hearing to May 27, 2015. The Court further finds that good cause exists for a continuance of the status hearing date to May 27, 2015. The Court finds that failing to exclude the time between May 5, 2015, and May 27, 2015, would unreasonably deny the defendant and counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between May 5, 2015, to May 27, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HERBY ORDERED that:

1. The status hearing date is extended to May 27, 2015;
2. good cause exists to extend time for the status hearing under Rule 5.1 to May 27, 2015; and
3. the time between May 5, 2015, and May 27, 2015, shall be excluded from computation under the Speedy Trial Act.

18 U.S.C. § 3161(h)(7)(B)(iv)

DATED: _____

United States District Magistrate Judge